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March 24, 2014

By Electronic Filing

Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Innovation Ventures, LLC et al. v. Ultimate One Distributing Corp. et al.*
Docket No. 12 Civ. 05354

Dear Judge Mann:

I am lead counsel for Defendant Valero Retail Holdings, Inc. which became CST Services LLC, a wholly-owned subsidiary of CST Brands, Inc., as of May 1, 2013 ("Valero") in this matter and write to respectfully request an extension of time to respond to Plaintiffs' March 19th letter seeking a protective order until Thursday, March 27, 2014. The reason for this request is that I am currently on a family vacation, which began on March 20, and will not be returning to the office until the morning of March 27, 2014. During my vacation I have intermittent internet and phone access and therefore will be unable to substantively respond to Plaintiff's letter by today's March 24, 2014 deadline as prescribed by the local rules.

Very truly yours,

/s/ Hara K. Jacobs

Hara K. Jacobs

HKJ:dez